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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONEL
MANAGEMENT, *et al.*,

Defendants.

Case No. 3:25-cv-1780-WHA

**DECLARATION OF KRYSTI J. WELLS
IN RESPONSE TO THE COURT'S
September 12, 2025, ORDER**

1 I, Krysti Wells, declare, pursuant to 28 U.S.C. § 1746, as follows:

2 1. I am the acting Chief Human Capital Officer at the U.S. Environmental Protection
3 Agency (“EPA” or “Agency”) headquartered in Washington, D.C. I make this Declaration based
4 on my own personal knowledge, on information contained in the records of the EPA, or on
5 information provided to me by EPA employees.

6 2. I have served in this position since September 29, 2025. In my role, I am
7 responsible for EPA’s human capital program. Part of these responsibilities include overseeing
8 the processing and implementation of personnel actions, including ensuring the actions and
9 records thereof are in compliance with federal law and regulation.

10 3. I previously submitted a declaration to this Court acknowledging receipt and
11 review of the September 12, 2025, Order.

12 4. I have confirmed that for each individual who received a notice of termination in
13 February 2025 based on a variation of the Office of Personnel Management template termination
14 during a probationary or trial period notice, their official personnel file (or “eOPF”) does not
15 reflect any documentation of the since-rescinded February 2025 notice or termination. As there is
16 no remaining eOPF documentation of the notice or action, there is no documentation, including
17 SF-50s, to update or amend.

18 5. Between October 29-31, 2025, EPA sent a notice (an example of which is
19 attached as Exhibit A) individually to each person who received a notice of termination in
20 February 2025 based on a variation of the Office of Personnel Management template termination
21 during a probationary or trial period notice.

22 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
23 and correct.

24
25 /s/ KRYSTI WELLS Digitally signed by KRYSTI
WELLS
Date: 2025.11.14 15:58:17 -05'00'
26 KRYSTI J. WELLS
27
28



OFFICE OF MISSION SUPPORT

WASHINGTON, D.C. 20460

October 31, 2025

[REDACTED]
[REDACTED]@EPA.GOV ; [REDACTED].EDU

Dear [REDACTED]:

This notice is provided to you pursuant to an order issued on September 12, 2025, by the United States District Court for the Northern District of California in the case *American Federation of Government Employees v. U.S. Office of Personnel Management*, No. 3:25-cv-1780-WHA (N.D. Cal.).

As required by Paragraph 5 of the district court's order, EPA informs you that you were not terminated in February 2025 on the basis of your personal performance or conduct.

As required by Paragraph 3 of the order, EPA has confirmed that your up-to-date official personnel file (or "eOPF"), does not reflect your since-rescinded February 2025 notice or separation.

Sincerely,

s/

Krysti Wells

Acting Chief Human Capital Officer
U.S. Environmental Protection Agency